



**WIAB 13-00**

**DATE:** April 10, 2001  
**TO:** All Local Workforce Investment Areas  
**FROM:** Cheryl A. Brush, Chief, Workforce Systems Bureau  
**SUBJECT:** Skill Attainment Options

As part of our ongoing process of trying to simplify implementation of skill attainment systems, we have identified an additional option that local areas may want to consider adopting regionally.

A question came up recently as to whether a local area could use the optional tools from the WIA -130 series as a pre-test for work readiness skills. While this seemed a viable idea at the outset of WIA, we have since concluded that these documents do not meet the USDOL criteria of being "objective, unbiased, conforming to widely accepted criteria, having been field tested for utility, consistency, and accuracy and providing for the training of all raters to ensure inter-rater reliability". In fact, the features that make this document a particularly good assessment tool (open ended questions, no "right or wrong answers") are the very features that limit its ability to meet the USDOL criteria for work readiness skills. We have advised those areas proposing to use the WIA -130 for pre-test purposes accordingly.

As part of the discussions about use of the WIA -130 series, however, we heard numerous comments from local staff that, unlike basic skills and occupational skills, virtually all youth are deficient in work readiness skills and that the time and effort attendant to an actual pre-test in this area are not well-spent, have yielded little additional information with which to build a service strategy, and have detracted from time that could be used providing the needed services. In an effort to explore all possibilities for simplification of these systems, we have done some additional research and pursued this issue with USDOL, proposing the option of using presumptive need for work readiness skills with the argument above as well as that "This technique would indeed appear to meet USDOL criteria for assessment tools, as it would be 'objective, unbiased and conform to widely accepted, clearly defined criteria'; field testing for utility, consistency, and accuracy would not be needed and no training/preparation of all raters/scorers would be required."

We have reached an agreement with USDOL that it would be acceptable from a performance management perspective to allow local areas that choose to do so to use presumptive need for work readiness skills rather than administering actual pre-tests in this area. USDOL's exact language on this is that "The State can allow the areas to have a policy to presume work readiness skill deficiencies for all participants as long as it is applied consistently. However, they will need to use additional tools to determine an individual strategy." This means that a decision to presume deficiency in work readiness skills will need to be an area-wide decision and that presumption of need will need to be supplemented with additional exploration of a participant's circumstances in order to develop service strategies.

In considering whether this option is advisable for your area, you will need to consider the implications of doing this. While this option does provide some relief from testing requirements upfront, it also inherently carries with it the obligation to address presumed deficiencies. That is, training in work readiness skills will be required as part of the service strategy for all youth for whom deficiency has been presumed. The exact nature and scope of that training would depend on the “additional tools” that help determine the specific strategy.

As you know, the requirement for skill attainment goals applies to all in-school younger youth and any out-of-school younger youth assessed to be in need of basic skills, work readiness skills, and/or occupational skills. With this in mind and depending on the circumstances in your area, you may want to limit this presumption of need to in-school youth and continue to determine need for work readiness skill goals for out-of-school youth on a case-by-case basis, through administration of your existing tests.

For those areas that elect to utilize a presumptive need option for work readiness skills, the tools from the WIA-130 series (or other available instruments) could be used to supplement the presumption of need and be treated as an investigative tool to further delineate a service strategy. This would allow these instruments to serve their intended purpose without trying to force fit them into USDOL skill attainment assessment criteria.

USDOL’s concurrence on this notion of presumptive need for work readiness skills is made with the understanding “criteria-compliant post-tests” would continue to be administered to each youth to demonstrate proficiency. The relief provided in this memo is therefore on “front end testing requirements” for work readiness skills only, not on the instruments used to measure actual acquisition of skills or on the other two skill areas, except as already provided for in your certified competency systems.

For those local areas that wish to adopt this option for your work readiness skills, you will need to modify your skill attainment system accordingly. If you choose to do this effective July 1, you may do it in your PY2001 plan modification; if you want this option to be a part of this year’s process, you will need to submit a modification to this year’s plan.

**Providers will contact local IWB staff to determine if this presumptive need option is being adopted locally.**

If you have any questions about this, please give Laura a call.